

JS-6

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12909 CORDARY, LLC, a California
limited liability company,

Plaintiff,

v.

HUSSEIN M. BERRI, an individual,
EXCALIBER FUELS, a California
corporation, and
DOES 1-10, inclusive,

Defendants.

HUSSEIN M. BERRI, an individual,
EXCALIBER FUELS, a California
corporation,

Cross-Complainants,

v.

12909 CORDARY, LLC, a California
limited liability company;
WESTMINSTER LIVING, L.P., a
California limited partnership;
PACIFIC HOUSING
MANAGEMENT, INC., a
California corporation;
RICHARD A. HALL, an individual;
and
ROES 1 through 100, inclusive,

Cross-Defendants.

Case No. 8:22-cv-01748-JWH-JDE

FINAL JUDGMENT

Pursuant to the verdict rendered by the jury at trial,¹ and for the reasons stated in open Court during the hearing on July 12, 2024,²

It is hereby **ORDERED, ADJUDGED, and DECREED** as follows:

1. This Court possesses subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. §§ 1331 & 1367 and 42 U.S.C. § 6972.

2. The parties in this case are:

- a. Plaintiff 12909 Cordary, LLC (“Cordary”);
- b. Defendant Hussein M. Berri;
- c. Defendant Excaliber Fuels;
- d. Cross-Defendant Richard A. Hall;
- e. Cross-Defendant Westminster Living, L.P.; and
- f. Cross-Defendant Pacific Housing Management, Inc.

3. Cross-Defendants Richard A. Hall; Westminster Living, L.P.; and Pacific Housing Management, Inc. were **DISMISSED without prejudice** on or about September 3, 2024.

4. The only operative pleading in this case is the Complaint [ECF No. 1] of Plaintiff Cordary, in which Plaintiff Cordary asserts the following claims for relief:

a. Claim 1 for Strict Liability under the Resource Conservation and Recovery Act (“RCRA”), 42 U.S.C. § 6972(a)(1)(B), against Defendants Hussein M. Berri and Excaliber Fuels (jointly, “Defendants”);

b. Claim 2 for Cost Recovery under the Comprehensive Environmental Response, Compensation, and Liability Act (“CERCLA”), 42 U.S.C. § 9607(a), against Defendants;

¹ See Redacted Verdict Form [ECF No. 197].

² Minute Order re Hr’g on July 12, 2024 [ECF No. 228]

1 c. Claim 4 for Declaratory Relief under CERCLA against
2 Defendants;

3 d. Claim 7 for Private Nuisance against Defendants;

4 e. Claim 8 for Trespass against Defendants;

5 f. Claim 9 for Negligence against Defendants; and

6 g. Claim 10 for Declaratory Relief against Defendants.

7 5. Plaintiff Cordary shall have **JUDGMENT** in its favor on its RCRA
8 claim against Defendants.

9 6. Plaintiff Cordary shall have **JUDGMENT** in its favor on its
10 CERCLA claims against Defendants.

11 7. Defendants shall have **JUDGMENT** in their favor on Plaintiff
12 Cordary's claim for Private Nuisance.

13 8. Plaintiff Cordary shall have **JUDGMENT** in its favor on its claim
14 for Trespass against Defendants.

15 9. Defendants shall have **JUDGMENT** in their favor on Plaintiff
16 Cordary's claim for Negligence.

17 10. Plaintiff Cordary shall have **JUDGMENT** in its favor on its claim
18 for Declaratory Relief against Defendants.

19 11. Plaintiff Cordary is **AWARDED** monetary damages in the amount
20 of \$3,000 against Defendants, jointly and severally.

21 12. Defendants, and each of them, are **ORDERED** forthwith to
22 investigate fully and to remediate the solid and hazardous wastes at the property
23 located at 8482 Westminster Boulevard, Westminster, California (the
24 "Excaliber Property") and the property located at 14041 Newland Street,
25 Westminster, California (the "Newland Property") in a manner that complies
26 with the National Oil and Hazardous Substances Pollution Contingency Plan,
27 more commonly called the National Contingency Plan (the "NCP"), 40 CFR
28

1 Part 300, 42 U.S.C. §§ 9601, *et seq.*, pursuant to Plaintiff Cordary's RCRA and
2 Trespass claims.

3 13. Defendants, and each of them, are **ORDERED** to implement the
4 actions identified in the Revised Corrective Action Plan, which is attached
5 hereto as Exhibit A, at the Newland Property in a manner that complies with the
6 NCP, pursuant to Plaintiff Cordary's RCRA and Trespass claims.

7 14. Defendants, and each of them, are **ORDERED** to conduct all
8 actions identified in this Final Judgment and all other future work arising from
9 or relating to the solid and hazardous wastes at the Excaliber Property and
10 Newland Property in a manner that complies with the NCP, pursuant to Plaintiff
11 Cordary's RCRA and Trespass claims.

12 15. Defendants, and each of them, are **RESTRAINED** from allowing
13 Defendants' solid or hazardous wastes to enter onto the Newland Property,
14 pursuant to Plaintiff Cordary's RCRA and Trespass claims.

15 16. This Court retains jurisdiction over this case and over the parties to
16 order any other remedies that may be necessary to implement the terms of this
17 Final Judgment.

18 17. Other than potential post-judgment remedies (including those
19 provided in Rule 54(d) of the Federal Rules of Civil Procedure), to the extent
20 that any party requests any other form of relief, such request is **DENIED**.

21 **IT IS SO ORDERED.**

22
23 Dated: November 27, 2024


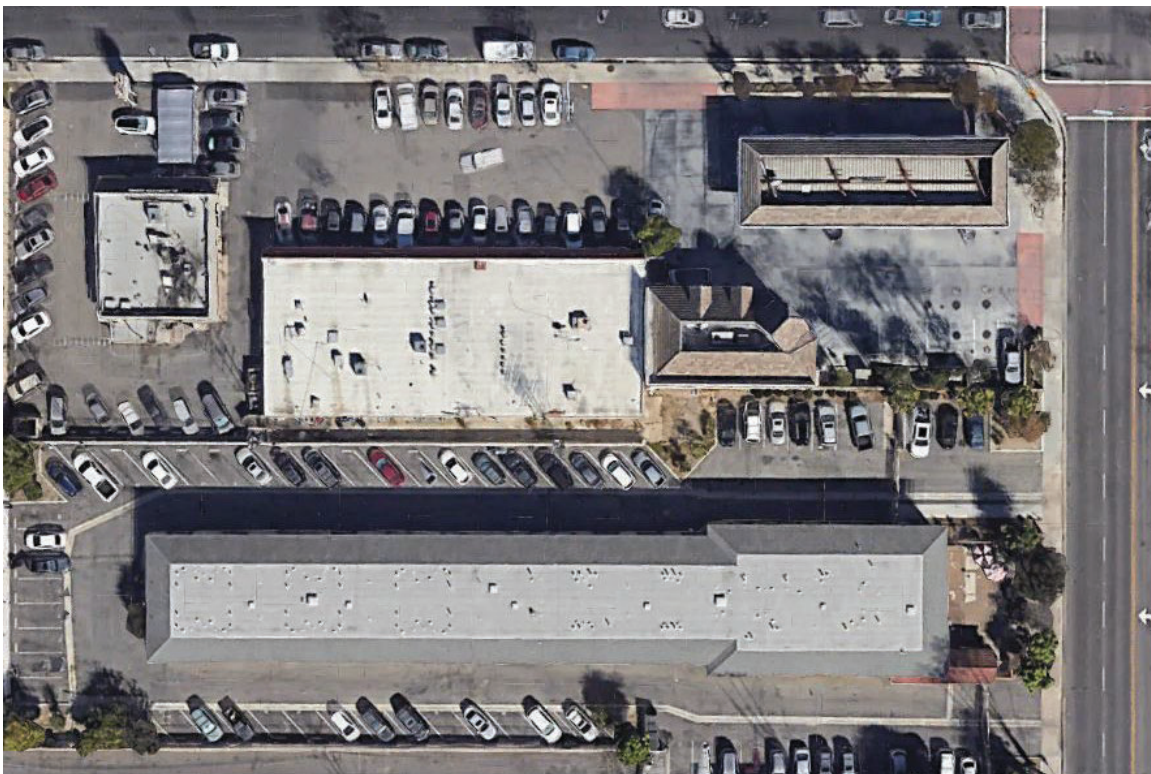
24 
25 _____
26 John W. Holcomb
27 UNITED STATES DISTRICT JUDGE
28

EXHIBIT A

EXCALIBUR FUELS, INC.

CORRECTIVE ACTION PLAN BERRI PROPERTY

8482 WESTMINSTER BLVD, WESTMINSTER, CA



DEF EX P.0000006627



CORRECTIVE ACTION PLAN BERRI PROPERTY 8482 WESTMINSTER BLVD, WESTMINSTER, CA

EXCALIBER FUELS, INC.

VERSION 1.0

PROJECT NO.: 31405365.13 TASK 6

DATE: APRIL 2023

REVISED MAY 2023

WSP

SUITE 200

1100 W TOWN AND COUNTRY ROAD

ORANGE, CA 92868


WSP.COM

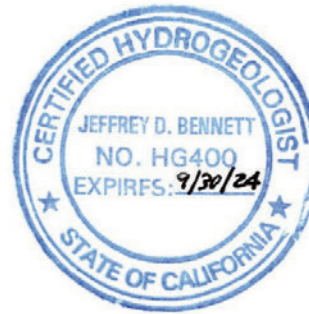
SIGNATURES

PREPARED BY


Rebecca Sundilson
Lead Consultant, Environmental Scientist

REVIEWED BY


Jeffrey Bennett, PG, CHG, CEM
Sr. Lead Consultant, Geologist



This report was prepared by WSP USA (WSP) for the account of Excaliber Fuels, Inc. , in accordance with the professional services agreement. The disclosure of any information contained in this report is the sole responsibility of the intended recipient. The material in it reflects WSP's best judgement in light of the information available to it at the time of preparation. Any use which a third party makes of this report, or any reliance on or decisions to be made based on it, are the responsibility of such third parties. WSP accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this report. This limitations statement is considered part of this report.

The original of the technology-based document sent herewith has been authenticated and will be retained by WSP for a minimum of ten years. Since the file transmitted is now out of WSP's control and its integrity can no longer be ensured, no guarantee may be given with regards to any modifications made to this document.



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FIGURES

FIGURE 1	SITE VICINITY MAP
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A	SCHEMATIC WELL DIAGRAM & PROCESS FLOW DIAGRAM
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1 INTRODUCTION

Excaliber Fuels, Inc. (Excaliber) contracted WSP USA (WSP) to prepare this *Corrective Action Plan* (CAP) for the Berri Property (OCLOP Case Number 99UT06) located at 8482 Westminster Boulevard in Westminster, California and the south adjacent apartment building property (Site; see Figure 1 and Figure 2). This CAP has been prepared to discuss the conceptual design associated with the proposed installation and operation of a Dual Phase Vapor Extraction system as recommended by WSP (formerly EarthCon Consultants CA, Inc.) in the *Pilot Study Performance Report* (EarthCon, 2021) in order to address impacts to soil, soil vapor, and groundwater associated with a release of gasoline from a former underground storage tank (UST) at the Site. Therefore, the following sections include a summary of the Site history, pilot study recommendations, and a discussion of the CAP.

2 SITE HISTORY

Excaliber previously provided ownership history for the Site, which included the approximate original construction date of the station in the early 1960's. The Site sold various brands of fuel over time until fueling operations ceased temporarily, when double-walled tanks and lines were required, and the Site operated as an automotive repair facility only. The old tanks were eventually removed, and new tanks were installed for a new station that began operating as Mobil in 2002. Mobil fuel was used at the Site from 2002 to approximately 2011. The Site began using Unocal as a fuel source in 2011, continuing to the present.

According to the State Water Resources Control Board (SWRCB), a leak of the underground storage tank (UST) systems was reported for the Site on September 30, 1999 during the removal of USTs (SWRCB, 2012). A total of 5 USTs were removed (four gasoline and one waste oil) and five new USTs (four gasoline and one diesel) were subsequently installed in 2001 (SWRCB, 2018). As a result of the release, both soil and groundwater were impacted within the vicinity of the Site.

Dual Phase Vapor Extraction (DPVE) pilot testing was conducted in 2002 and indicated that with a flow rate of 70 standard cubic feet per minute (SCFM), with well head vacuum of 299 inches of water, and a constant groundwater pumping rate of 2.5 gallons per minute (gpm), that a radius of influence of 83 feet in the vadose zone and a groundwater capture zone of approximately 420 feet in the cross-gradient direction and 135 feet in the downgradient direction could be realized. Based on the results of the pilot testing, DPVE and groundwater remediation activities were initiated in December 2004 and were completed in October 2006 with approximately 17,750 pounds of vapor-phase total petroleum hydrocarbons as gasoline and 1.42 million gallons of contaminated water being removed (SWRCB, 2018). Approximately 18 months of in-situ remediation decreased the soil vapor concentrations to less than 100 ppmv gasoline at the DPVE system inlet. The DPVE system was no longer removing significant mass of gasoline in soils below the water table; therefore, The Reynolds Group (TRG) subsequently conducted three full scale chemical injection events between 2008 and early 2009. The events utilized 33 injection points in the driveway of an apartment complex located south of the Site and 20 points on-Site (The Reynolds Group, 2008). It is unclear why the remediation efforts implemented by the previous consultant did not result in successfully reaching the LTCP goals for the Site.

According to the SWRCB, free product was first observed at the Site in 2001 (SWRCB, 2018). In August 2014, free product thickness significantly increased in MW5, subsequently requiring free product removal activities to be conducted. Removal activities, using hand bailing and vacuum truck extraction, removed approximately 97 gallons of free product between August 2014 and November 2015. (The Reynolds Group, 2016).

On June 29, 2017, OCLOP submitted a letter to Excaliber stating that groundwater monitoring had not been conducted since the third quarter of 2014 and status reports regarding the case progress had not been submitted to OCLOP in over 2 ½ years. EarthCon was contracted by Excaliber to conduct groundwater monitoring activities, starting in April 2018 (EarthCon, 2018). The results of the April 2018 monitoring event were discussed in a meeting with Excaliber, the Orange County Health Care Agency's Orange County Local Oversight Program (OCLOP), EarthCon and the Santa Ana Regional Water Quality Control Board (RWQCB) on July 17, 2018. A letter from the OCLOP, dated July 18, 2018 summarized the items discussed in the meeting. It was determined that the Site doesn't meet the criteria presented in the SWRCB's Low Threat Closure Policy; therefore, further investigation and remediation was required.

In addition, due to the elevated detections of benzene in groundwater, a soil vapor survey in the area to the south, near adjoining apartment complexes and beyond MW7 and MW8 was required by OCLOP. Results of an initial soil vapor study, conducted on January 23, 2019, indicated the presence of elevated benzene concentrations in multiple samples in the vicinity of MW-5. Based on the analytical results, OCLOP requested that a subsequent investigation be conducted to further evaluate the vapor concentrations beneath the apartment building.

A supplemental soil vapor survey and soil investigation in May 2019 demonstrated that concentrations of fuel-related compounds exceeded applicable soil vapor criteria for residential properties in sub-slab and 5 ft bgs samples, specifically for benzene. Preliminary discussions with the OCLOP regarding next steps for the Site have indicated that criteria exceedances in these areas will require active remediation. EarthCon conducted a review of active remedial efforts implemented in the vadose zone at the Site to date, including design standards, proposed results, and actual results and used this information to

evaluate potential remedial options in the *Feasibility Study* (EarthCon, 2020b). It was concluded that a pilot test study needed to be conducted to more accurately assess Site conditions and provide data for the subsequent design of an effective DPVE system for the Site. Therefore, the Pilot Study was subsequently implemented at the Site, as discussed in further detail in the following section.

3 PILOT STUDY

On December 4, 2020, a pilot study test was conducted using a trailer mounted DPVE which consisted of one extraction well and twelve observation wells. As indicated in the Workplan, the planned pilot study tests entailed a warm-up test, a step test, and a constant rate test. However, completion of the pilot test deviated from the sequence of events anticipated for the Site because of the nature of the formation's response to the test procedures. Based on initial field results, the test was reconfigured to collect the information needed to evaluate application of DPVE remedial technology at the Site.

The results of pilot testing indicated that elevated concentrations of gasoline-range hydrocarbons remain at the Site. The primary concentration of these materials is likely within the shallow, finer-grained materials that would be in contact with the LNAPL at the surface of the groundwater and also would be associated with capillary fringe and smear zone located within these materials. The well network at the Site penetrates these materials and extends into coarser grained sand below, which is described as "beach sand", of which a significant fraction is described as coarse sand. It is probable that previous DPVE remedial activities at the Site preferentially extracted groundwater from this higher permeability portion of the soil profile rather than the less permeable materials containing the bulk of the residual fuel. Utilizing wells screened within the finer-grained materials would alleviate much of this potential issue. Therefore, it was subsequently recommended that any new wells associated with remedial activities at the Site be completed above the transition to coarser grained sand.

The effective radius of influence indicated by the pilot test study was approximately 12 feet in the vadose zone and a roughly equivalent value in the shallow saturated zone. These values were significantly smaller than the 83 feet in the vadose zone and up to 420 feet in the saturated zone predicted by previous testing, which may partially explain the inability of the previous system to attain Site closure. Effective implementation of DPVE requires lowering the water table as much as possible to expand the vadose zone and allow induced air movement to extract residual hydrocarbons.

Results from the *Pilot Study Performance Report* subsequently recommended the installation and operation of a DPVE system to address the remaining impacts associated with the gasoline release. In addition, the DPVE system design will potentially provide additional capacity to include a sub-slab gas depressurization component if additional influence beyond the DPVE wells is required to extend the vacuum front beneath the adjacent apartment building.

4 DUAL PHASE VAPOR EXTRACTION

4.1 CONCEPTUAL DESIGN

Based on the results of the pilot study, the design of a DPVE system was recommended for the Site that utilizes shallower well completions and closer well spacings to allow the system to effectively address the impacted soil and groundwater. In addition, the primary concentration of these materials is likely within the shallow, finer grained materials that would be in contact with the LNAPL at the surface of the groundwater and would be associated with the capillary fringe and smear zone located within these materials. Therefore, utilizing wells screened within the finer-grained materials is also recommended.

As indicated in the pilot study, the effective radius of influence (ROI) was approximately 12 feet in the vadose zone and a roughly equivalent value in the shallow saturated zone. Therefore, as illustrated on Figure 3, the conceptual design of the DPVE system includes 25 proposed extraction wells with a 12 ft ROI. In addition, previously installed subslab/soil gas probes SG-13 through SG-18 will be included in the conceptual design. These probes will be sampled prior to startup of the DPVE system and will subsequently be used for monitoring of system vacuum influence, fuel-related compound vapors, and volatile organic compounds once the DPVE system is operating. The conceptual design illustrated also shows the proposed layout in relation to the most recent groundwater contour for benzene concentrations.

The proposed well network includes both A-series and B-series wells. The A-series wells will be advanced into the shallow silty sand material. The B-series wells will be advanced deeper into the coarse sand material that has been observed at start at approximately 15 ft bgs. This conceptual design was selected to allow initial operation of the system using both the A-series and B-series wells, with the B-series wells utilizing a suction stinger placement within the shallower silty sand zone. During operation of the B-series wells in shallow extraction mode, the flow rates would be monitored closely to minimize preferential extraction from the deeper zone. Over time, should it be determined that contaminants remain in the deeper, coarser material, this design will allow the adjustment of the B-series wells to advance the suction stingers into the deeper zone. Figure A-1 in Appendix A illustrates the proposed schematic well diagrams for the A- and B-series wells. Additionally, each of the wells will be connected to the proposed manifold and the proposed equipment compound within the adjacent apartment building property boundary (See Appendix A-2). Should monitoring of the DPVE system results suggest that additionally capacity may be required, subslab depressurization utilizing a horizontal extraction well in the vadose zone soil underneath the footing of the building will be evaluated.

Once the conceptual design has been approved by the RWQCB, it will be used to specify equipment and prepare the engineering drawings that will be provided to the subcontractors in the subsequent request for proposals. In addition, the engineering drawings will also be provided in the various permitting packages, as discussed below.

4.1.1 PERMITTING

Once the CAP is approved, the appropriate permits will be obtained prior to construction of the proposed DPVE system on-site. The required permits are discussed below in the following sections.

4.1.1.1 SCAQMD

The South Coast Air Quality Management District (SCAQMD) requires an equipment permit be obtained for the installation of a DPVE system. Prior to DPVE installation and associated Site activities, Forms 400A, 400-CEQA, Form 400-PS and a supplemental Form 400-E-xx, if applicable, will be submitted for the DPVE system with applicable fees. Work will not commence until the associated permits have been approved by the SCAQMD.

4.1.1.2 ORANGE COUNTY SANITATION DISTRICT

A Special Purpose Discharge Permit (SPDP) must be issued by the Orange County Sanitation District (OCSD) for wastewater discharge into the sewerage system, as necessary for the operation of a DPVE system. No later than 30 days prior to start of discharge, the following information will be submitted for the SPDP; (1) a complete lab analysis for all pollutants regulated under the OCSD Local Discharge Limits; (2) estimated wastewater volume and flow rate in units of gallons and gallons per minute, respectively; (3) approval from the local sewer agency for flows of 50,000 gpd or more; (4) location, start date, and duration of discharge; and (5) general details of the pretreatment equipment. Upon acceptance, OCSD will send a SPDP application package to the applicant. The SPDP will be obtained from the OCSD prior to implementation of Site discharge activities.

4.1.2 INSTALLATION & OPERATION

In addition to the permits identified above, Excaliber will update the current access agreement for the adjacent property to allow the installation and subsequent operation of the DPVE to occur. Installation of the extraction wells and manifold piping will be coordinated with the adjacent property representative to minimize disruptions to the residents.

Once the permits have been received, installation and will be coordinated with both parties (Excaliber and adjacent property owner) in accordance with the most recent access agreement. Additionally, installation and subsequent operation will be conducted in accordance with the approved agency permits. The DPVE system maintenance and monitoring will likely be on a routine schedule as required by the SCAQMD and OCSD permits.

5 SCHEDULE

The implementation of the DPVE system will be contingent upon obtaining the updated access agreement and relevant permits as noted above.

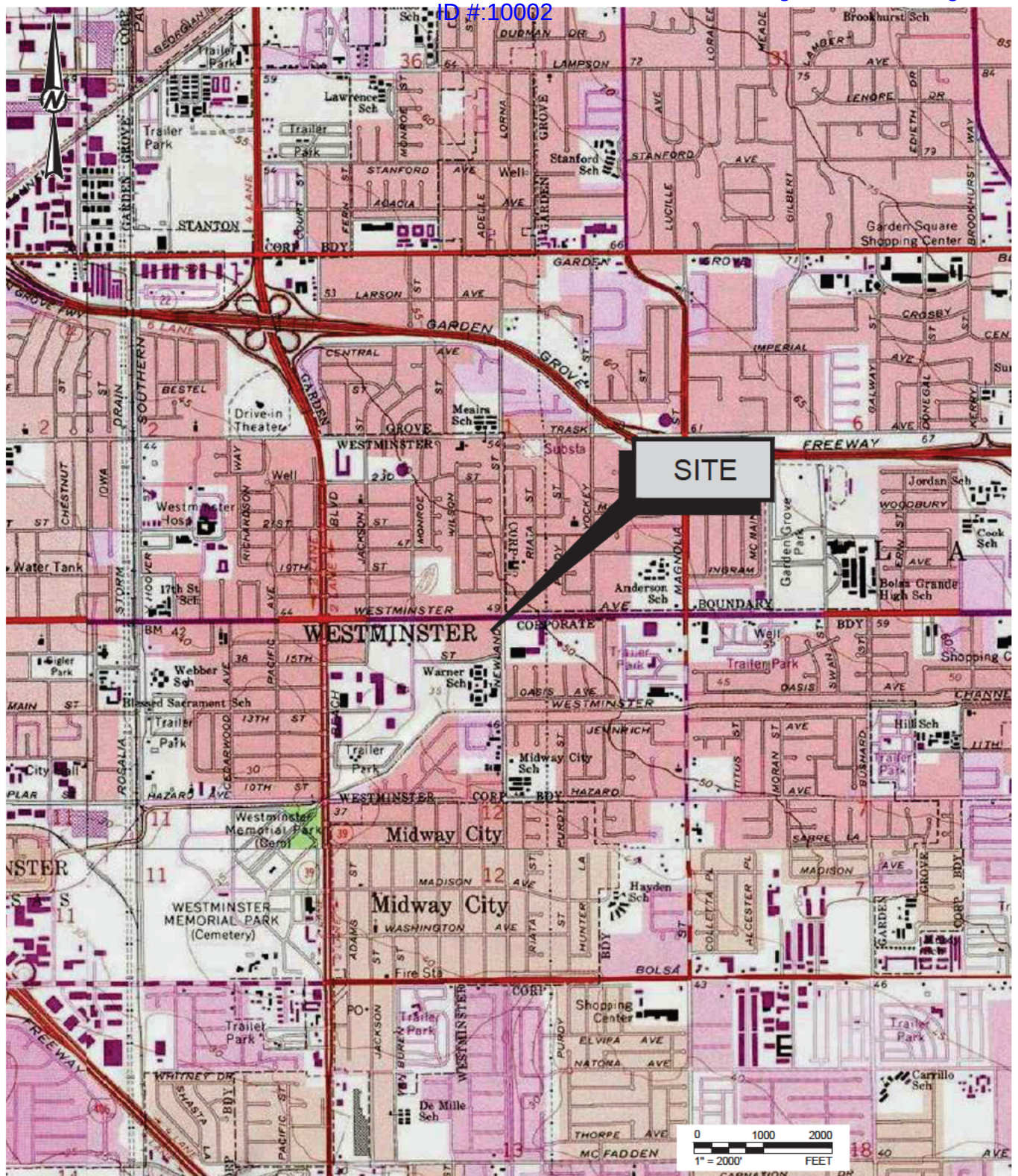
Task	Estimated Schedule
Preparation of engineering details/drawings for RFP & submittal of RFP to vendors/subcontractors	30-45 days from approval of CAP by RWQCB
Submit permit applications to SCAQMD and OCSD	Within 2 weeks of completion of engineering details/drawings
Obtain permits from SCAQMD and OCSD	Within 30 days of submittal
Begin installation of DPVE system	Within 30 days of receipt of permits, contingent on subcontractor and equipment availability
System startup testing	First week following completion of construction
Source Testing for air and water discharges	As identified in the applicable permits
Routine monitoring and maintenance	As identified in SCAQMD permit
Routine reporting	As identified in the SCAMD permit

6 REFERENCES

EarthCon Consultants CA, Inc. 2021. *Pilot Study Performance Report*. February 11, 2021.

EarthCon Consultants CA, Inc. 2020. *Pilot Study Workplan*. February 25, 2020

ID #10002



REFERENCE(S)
U.S. GEOLOGICAL SURVEY, QUADRANGLE: ORANGE, SERIES: 7.5-MINUTE QUAD.

CLIENT
EXCALIBUR FUELS

CONSULTANT



YYYY-MM-DD	2022-11-09
DESIGNED	AJD
PREPARED	AJD
REVIEWED	LL
APPROVED	LL

NOTE(S)
1. ALL BOUNDARIES AND LOCATIONS ARE APPROXIMATE.

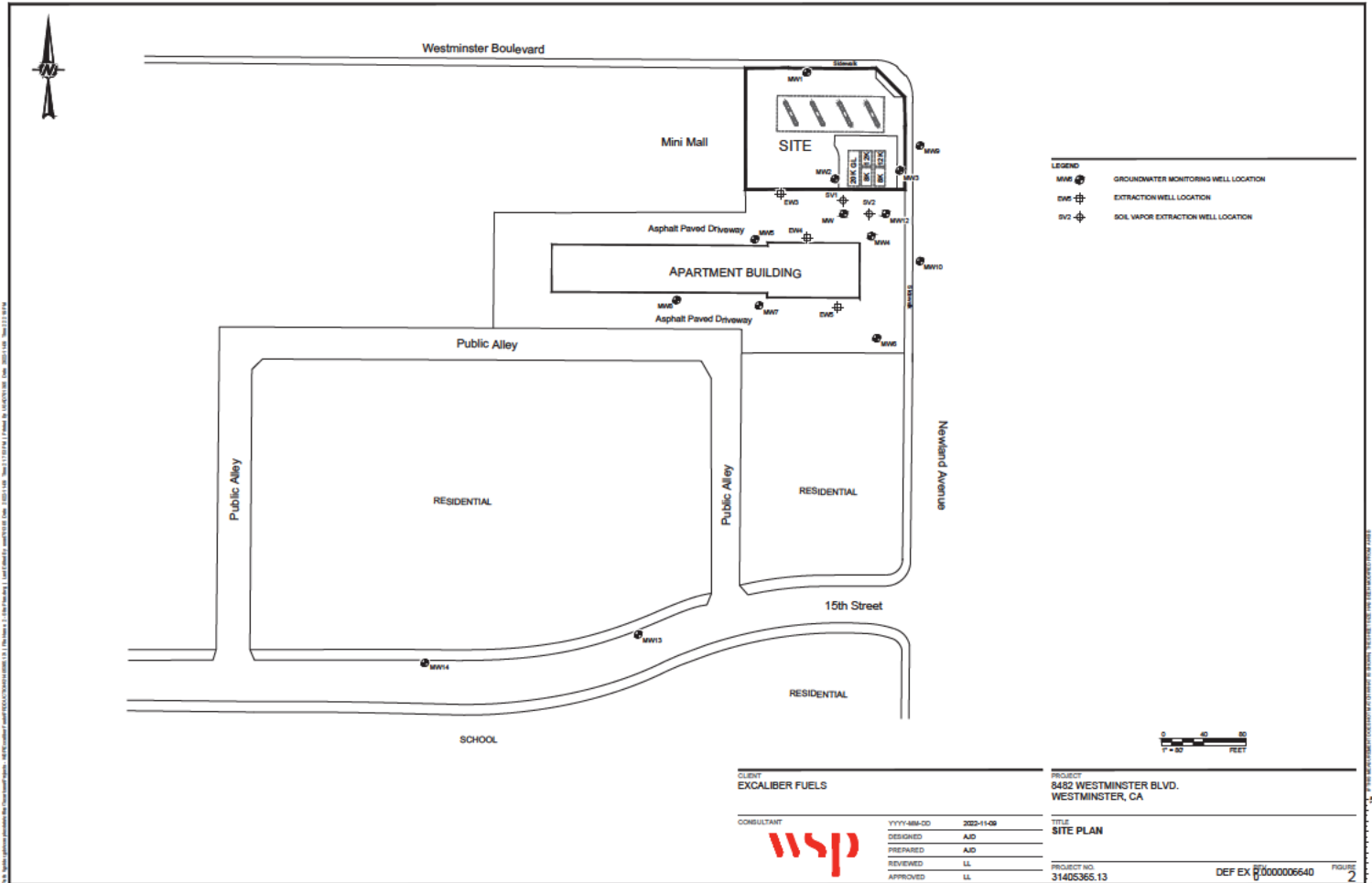
PROJECT
8482 WESTMINSTER BLVD.
WESTMINSTER, CA

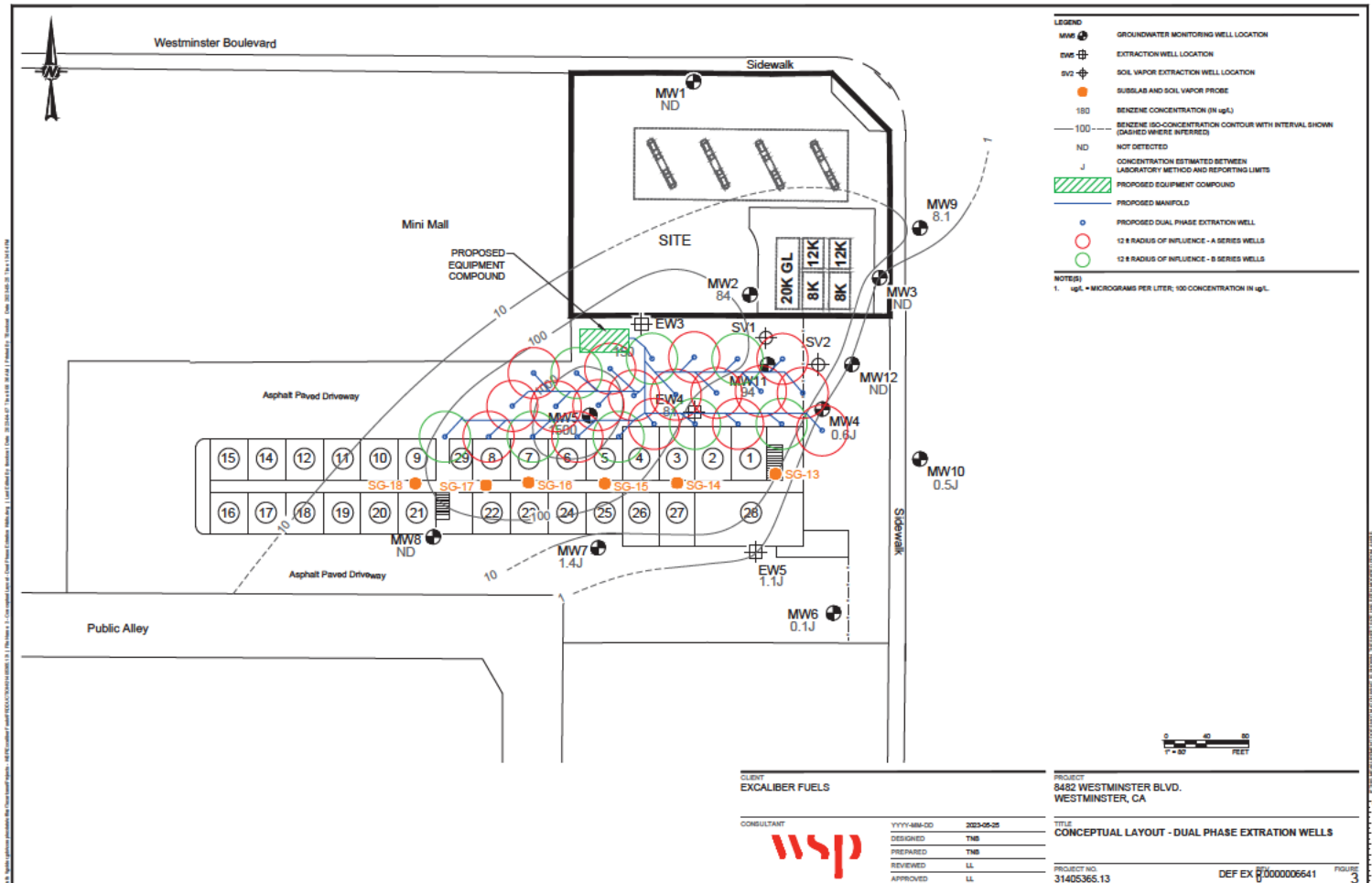
TITLE
VICINITY MAP

PROJECT NO.
31405365.13

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FIGURE
1

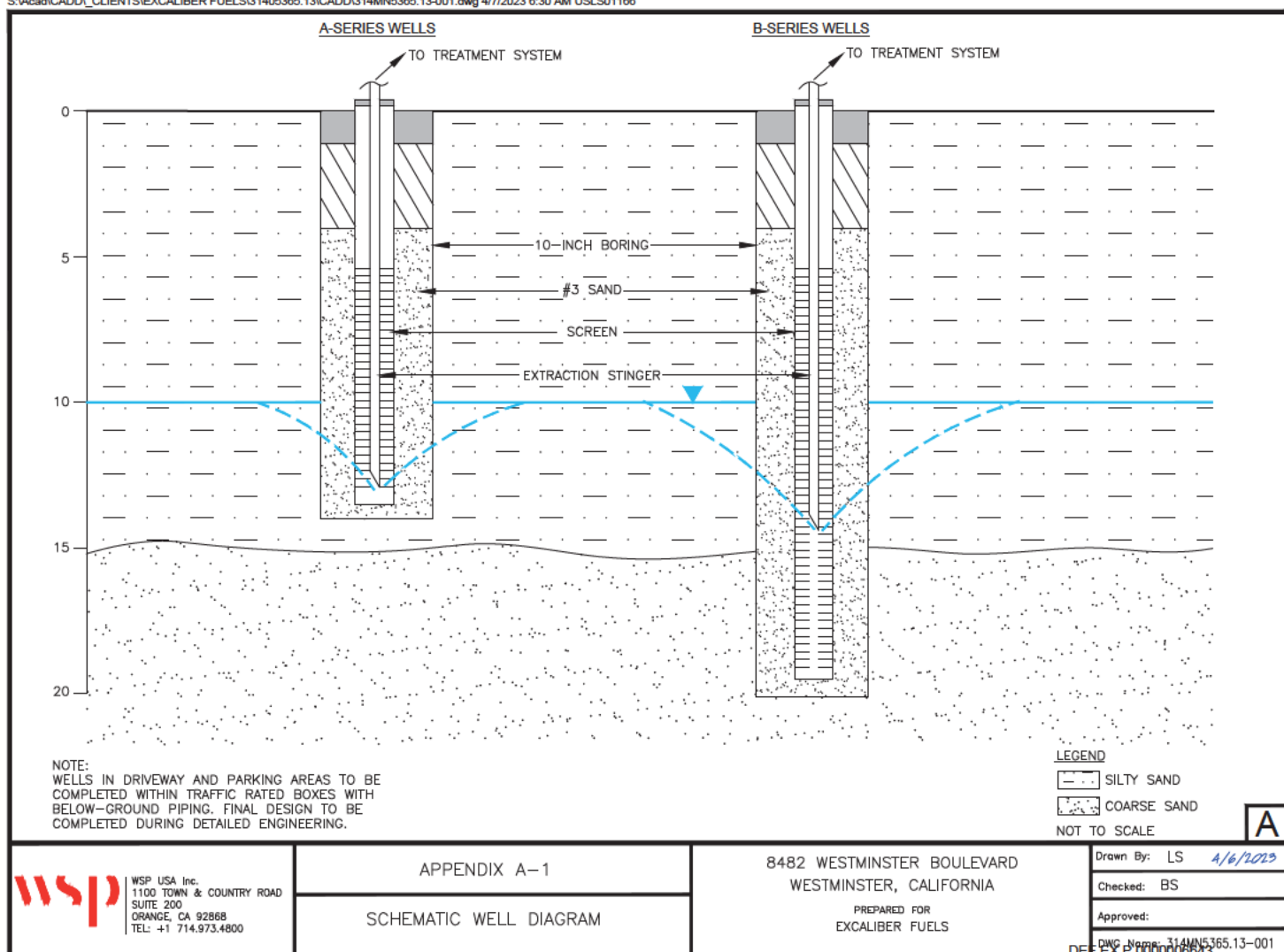




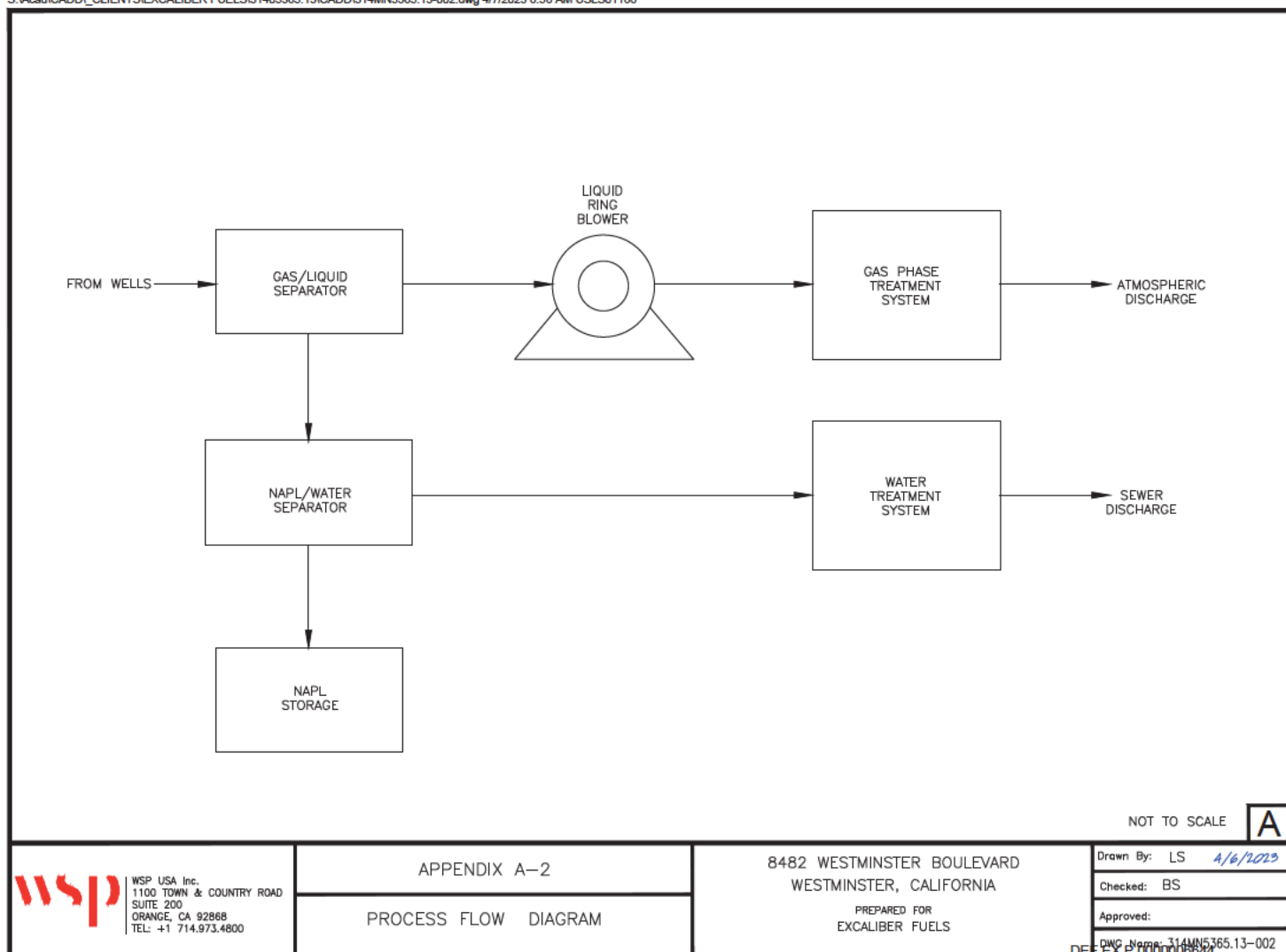
APPENDIX

A SCHEMATIC WELL DIAGRAM & PROCESS FLOW DIAGRAM

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**WSP USA Inc.**3560 Hyland Avenue
Suite 100
Costa Mesa, CA, 92626
www.wsp.com

May 30, 2023

Christopher Marino
Engineering Geologist
UST/SCP Section
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3348
chris.marino@waterboards.ca.gov

**Subject: COMMENTS ON CORRECTIVE ACTION PLAN
BERRI PROPERTY
8482 WESTMINSTER BOULEVARD
WESTMINSTER, CA (GLOBAL ID NO. T0605902346)
WSP PROJECT NUMBER 31405365**

Dear Mr. Marino,

WSP USA, Inc. (WSP), on behalf of Excaliber Fuels (Excaliber), is submitting this Response to Comments (RTC) addressing the Santa Ana Regional Water Quality Control Board (RWQCB) comments provided on the *Corrective Action Plan* (CAP) (WSP, April 2023) for the property located at 8482 Westminster Boulevard in Westminster, California (Site). The RWQCB UST/SCP Section provided comments on the CAP in a letter dated May 23, 2023. The RWQCB comments and subsequent RTCs are provided in the table below.

Comment 1) a): <i>Figure 3 shows the DPVE system and extraction well locations. The lower row of extraction wells on the figure are either in line with the building wall or shown within the footprint of the building. Please revise the drawing to show reasonable locations for those extraction wells away from the edge of the building.</i>	Response: Noted. Figure 3 has been revised to show the locations of the extraction wells outside the building footprint as proposed. The intent is to install the lower row of extraction wells in a planter between the building and the parking lot, or as close as reasonably possible, to maximize influence beneath the building.
Comment 1) b): <i>The CAP mentions additional capacity of the DPVE system to include a sub-slab gas depressurization component to help expand extraction influence further beneath the apartment</i>	Response: Noted. See edits made to Section 4.1 third paragraph.

DEF EX P.0000006645



<p><i>building. Please expand and explain how that would be performed.</i></p>	
<p>Comment 1) c): <i>Permanent soil vapor probes that were previously installed at the Site should be monitored. The probes were installed with sub-slab and 5' sample locations. The probes should be monitored prior to installation of the DPVE system and the results of that sampling will be used to determine the future monitoring schedule of the probes.</i></p>	<p><u>Response:</u> SG-13 through SG-18 have been added to Figure 3 for inclusion as monitoring points, as recommended. See additional text provided in Section 4.1 second paragraph.</p>

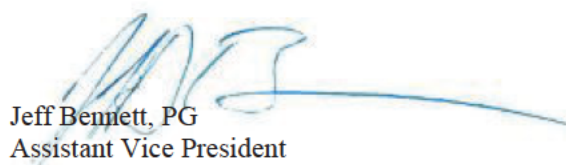
CLOSING

Upon approval of the revised CAP, further system specifications will be prepared and subsequently submitted to RQWCB. If there are any questions regarding the RTC, please contact Becky Sundilson (becky.sundilson@wsp.com) or Jeff Bennett (jeff.bennett@wsp.com).

Respectfully submitted,



Becky Sundilson
Lead Consultant
Environmental Scientist



Jeff Bennett, PG
Assistant Vice President
Geologist

CC : Hussein Berri (Excaliber Fuels, Inc).

